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13 JPMORGAN CHASE BANK, N.A.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 SELENA ARMAS, individually and on behalf
17 of all others similarly situated,

18 Plaintiff,

19 vs.

20 JP MORGAN CHASE BANK, N.A.; and
21 DOES 1 through 50,
22 Defendants.

Case No. 3:15-cv-00607

**DECLARATION OF LINDA
GOLDSMITH IN SUPPORT OF
DEFENDANT'S NOTICE OF
REMOVAL**

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DECLARATION OF LINDA GOLDSMITH
IN SUPPORT OF REMOVAL

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1. I currently serve as Managing Director, HR Bus. Partner, for Defendant JP Mortgage Chase Bank, N.A. ("Chase"). I have personal knowledge of the facts stated herein based on my review of Chase personnel records, and if called and sworn as a witness, I could and would testify competently to these facts.

3. I am informed and believe that Chase maintains information about its current and former employees in its PeopleSoft database. I am informed and believe that the PeopleSoft database is the official record of an employee's job titles while employed by Chase. The PeopleSoft database also includes information about an employee's dates of employment, exemption status, and work location. I have access to this information and have reviewed a report generated from this database of current and former Assistant Branch Managers who were classified as exempt and worked in California between January 6, 2011, and February 4, 2015.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on February 6, 2015, at Pacific Palisades, California.


Linda Goldsmith

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PROOF OF SERVICE

Armas v. JPMorgan Chase Bank, N.A.
USDC-Northern District of CA Case No. 3:15-cv-00607

I am a resident of the State of California, County of Orange; I am over the age of eighteen years and not a party to the within action; my business address is 5 Park Plaza, Suite 1750, Irvine, California 92614.

On February 6, 2015, I served on the interested parties in this action the within document(s) entitled:

**DECLARATION OF LINDA GOLDSMITH IN SUPPORT OF
DEFENDANT'S NOTICE OF REMOVAL**

- ☐ **BY FAX:** by transmitting via electronic facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.; I also caused the fax machine to print such record(s) of the transmission.
- ☒ **BY MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY OVERNIGHT MAIL:** By **FEDERAL EXPRESS**, following ordinary business practices for collection and processing of correspondence with said overnight mail service, and said envelope(s) will be deposited with said overnight mail service on said date in the ordinary course of business.
- ☐ **BY PERSONAL SERVICE:** I delivered to an authorized courier or driver authorized by First Legal Support to receive documents to be delivered on the same date. A proof of service signed by the authorized courier will be filed with the court upon request.
- ☐ **BY ELECTRONIC SERVICE:** the parties listed below were served electronically with the document(s) listed above by e-mailed PDF files on February 6, 2015. The transmission was reported as complete and without error. My electronic notification address is 5 Park Plaza, Suite 1750, Irvine, California 92614. My e-mail address is pmartin@morganlewis.com.

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2 [] **BY E-FILE:** I caused such documents to be transmitted by e-file
3 with the Clerk of the Court by using the CM/ECF system, which will
4 send a notice of electronic filing to the following:

5
6 Robert Ottinger, Esq. / Ori Edelstein, Esq. Attorneys for Plaintiff
7 THE OTTINGER FIRM, P.C. SELENA ARMAS
8 930 Montgomery Street, #502
9 San Francisco, CA 94133
10 Phone: 415.262.0096
11 Fax: 415.520.0555
12 robert@ottingerlaw.com
13 ori@ottingerlaw.com

14 [X] **FEDERAL:** I declare that I am employed in the office of a member
15 of the Bar of this Court at whose direction this service was made.

16 Executed on February 6, 2015, at Irvine, California.

17
18 
19 Patricia Martin